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UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

ORACLE USA, INC., a Colorado
 corporation; ORACLE AMERICA,
 INC., a Delaware corporation; and
 ORACLE INTERNATIONAL
 CORPORATION, a California
 corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada
 corporation; SETH RAVIN, an
 individual

Defendants.

Case No. 2: 10-cv-0106-LRH-PAL

**PLAINTIFFS' MOTION TO SEAL
 UNREDACTED COPY OF PLAINTIFFS' REPLY
 IN SUPPORT OF MOTION TO MODIFY
 PROTECTIVE ORDER, THE DECLARATION
 OF GEOFFREY M. HOWARD AND EXHIBITS A
 AND E THERETO**

Pursuant to the Stipulated Protective Order governing confidentiality of documents entered by the Court on May 21, 2010, Dkt. 55 (“Protective Order”), and Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Plaintiffs Oracle USA, Inc., Oracle America, Inc., and Oracle International Corporation (together “Oracle” or “Plaintiffs”) respectfully request that the Court order the Clerk of the Court to file under seal an unredacted copy of Plaintiffs’ Reply in Support of Plaintiffs’ Motion to Modify Protective Order (the “Reply in Support of the Motion to Modify”), the Declaration of Geoffrey M. Howard in Support of the Reply in Support of the Motion to Modify (“Howard Declaration”), as well as Exhibits A and E to the Howard Declaration. Plaintiffs will lodge an unredacted copy of the Reply in Support of the Motion to Modify, as well as Exhibits A and E under seal with the Court on June 25, 2012.

Sealing the unredacted Reply in Support of the Motion to Modify is requested because the redacted portions of the motion contains information that CedarCrestone, Inc. (“CedarCrestone”), the party which either produced the information or participated in the communications referenced therein, has designated as “Confidential Information” or “Highly Confidential Information - Attorney’s Eyes Only” under the terms of the Protective Order. Likewise, sealing of Exhibit A is requested because the document has been designated as “Highly Confidential Information - Attorney’s Eyes Only” by CedarCrestone. The sealing of Exhibit E is requested because the document has been designated as containing “Highly Confidential Information - Attorney’s Eyes Only” by Oracle. The Protective Order states, “Counsel for any Designating Party may designate any Discovery Material as ‘Confidential Information’ and ‘Highly Confidential Information - Attorney’s Eyes Only’ under the terms of this Protective Order **only if such counsel in good faith believes that such Discovery Material contains such information and is subject to protection under Federal Rule of Civil Procedure 26(c).** The designations by any Designating Party of any Discovery Material as ‘Confidential Information’ or ‘Highly Confidential Information - Attorney’s Eyes Only’ shall constitute a representation that an attorney for the Designating Party reasonably believes there is a valid basis for such designation.” Protective Order ¶ 2 (emphasis supplied).

1 CedarCrestone has identified the information redacted in the Reply in Support of the
 2 Motion to Modify and Exhibit A “Confidential” and “Highly Confidential,” and therefore
 3 CedarCrestone has represented that good cause exists for sealing those portions of the
 4 documents. Similarly, Oracle has identified the information redacted in Exhibit E as “Highly
 5 Confidential Information - Attorney’s Eyes Only,” and therefore Oracle represents that good
 6 cause exists for sealing those portions of the document. This is a sufficient showing of good
 7 cause to permit a sealing order on a non-dispositive motion. *See, e.g., Pacific Gas and Elec. Co.*
 8 *v. Lynch*, 216 F. Supp. 2d 1016, 1027 (N.D. Cal. 2002).

9 Oracle has submitted all non-redacted portion so the Reply in Support of the Motion to
 10 Modify, the Howard Declaration, as well as all other exhibits to the Howard Declaration for
 11 filing in the Court’s public files, which would allow public access to all but the redacted portions
 12 of the Reply in Support of the Motion to Modify and Exhibits A and E. Accordingly, the request
 13 to seal is narrowly tailored.

14 For the foregoing reasons, Oracle respectfully requests that the Court find that good cause
 15 exists to file under seal the unredacted copy of the Reply in Support of the Motion to Modify and
 16 Exhibits A and E to the Howard Declaration.

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 18
 19 DATED: June 25, 2012

BINGHAM McCUTCHEN LLP

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 22 By: /s/ Geoffrey M. Howard

23 Geoffrey M. Howard
 24 Attorneys for Plaintiffs
 25 Oracle USA, Inc., Oracle America, Inc.
 26 and Oracle International Corp.
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